

**REMARKS**

Claims 1 and 8 were objected to because of a noted informality. Applicant has amended these claims to address the issue.

Claims 9 and 10 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicant has amended claim 9 to address this issue.

Claims 8-12 are accordingly now in condition for allowance.

Claims 1-3, 5, 13-14, 18-21 and 26 were rejected under 35 U.S.C. 102(b) as being anticipated by Snyder. Applicant respectfully traverses and requests reconsideration.

Turning first to claim 1, Applicant claims “generating a shadow mask which identifies for each of a plurality of pixels on a shadow receiving surface of the shadow-receiving object *a grey level representing the intensity of shadow in each pixel, the intensity being determined utilizing the distance between the shadow-casting object and the shadow-receiving object*” (emphasis added). Thus, what is claimed by Applicant is the use of object-to-object distance in order to determine intensity of shadow in each pixel. Snyder fails to teach this claim feature.

The Examiner points to Snyder col. 91, lines 13-23 in support of the Section 102 rejection. Applicant disagrees. What Snyder teaches is a process for shadow modulation filtering which is applied to the shadow mask in order to blur shadow edges and achieve a smooth transition from shadowed to unshadowed portions of the image. This is accomplished by applying a filter. The operation of the filter does not consider or use the distance between the shadow-casting object and the shadow-receiving object to control intensity. Rather, as is discussed by Snyder at col. 91, line 24 to col. 92, line 59, it is the surface distance away from a light point which causes variation in intensity (see, Figure 34). Thus, it is clear that Snyder fails to teach or suggest considering object-to-object distance, as is specifically claimed by Applicant, in order to make decisions concerning variation in intensity.

With respect to independent claims 13, 14, 21 and 26, each of these claims includes a limitation which is directed to controlling the intensity of shadow in a pixel based on a determined distance between a shadow-casting object and the shadow-receiving object. These claims accordingly distinguish over Snyder for at least the same reasons as claim 1.

It is further pointed out that Snyder’s teaching is directed to creating smoother transitions between shadowed and un-shadowed portions of the image. This smoothing of shadow edges is a wholly different problem from the problem addressed by the claimed invention in which the intensity of a shadow is determined using the distance between the shadow-casting object and

the shadow-receiving object. There is no mention in Snyder of either the problem or solution of the claimed invention.

Applicant respectfully submits that all claims of the application are in condition for favorable action and allowance.

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Respectfully submitted,

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